



REPUBLIC OF THE MARSHALL ISLANDS

MARITIME ADMINISTRATOR

Marine Guideline

No. 2-13-8

Jan/2023

**TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF
MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS**

SUBJECT: Application of MARPOL, Annex II to Offshore Support Vessels

- References:**
- (a) **MARPOL Convention**, *International Convention for the Prevention of Pollution from Ships*, Consolidated Edition 2022
 - (b) **IBC Code**, *International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk*, 2020 Edition
 - (c) **IMO Resolution [A.673\(16\)](#)**, *Guidelines for the transport and handling of limited amounts of hazardous and noxious liquid substances in bulk on offshore support vessels*, adopted 19 October 1989, as amended (superseded by [A.1122\(30\)](#))
 - (d) **IMO Resolution [A.1122\(30\)](#)**, *Code for the transport and handling of hazardous and noxious liquid substances in bulk on offshore support vessels (OSV Chemical Code)*, adopted 6 December 2017
 - (e) **IMO Circular [MEPC.2/Circ.28](#)**, *Provisional categorization of liquid substances in accordance with MARPOL Annex II and the IBC Code*, issued 1 December 2022

PURPOSE

This Guideline explains how Offshore Support Vessels (OSVs) certified in accordance with IMO Resolution [A.673\(16\)](#) may meet the requirements to transport and handle hazardous and liquid substances in bulk. This revision incorporates [MEPC.2/Circ.28](#), and supersedes Rev. Jul/2022.

APPLICABILITY

This Guideline applies to OSVs constructed before 1 July 2018 that are transporting and handling hazardous cargoes.

BACKGROUND

IBC Code

The IBC Code amendments in IMO Resolution [MEPC.318\(74\)](#)¹ entered into force on 1 January 2021. They imposed revised, and in many cases, stricter carriage requirements for products listed in IBC Code Chapter 17 and in [MEPC.2/Circ.28](#). This created an issue for those OSVs:

- with keels laid or were at a similar stage of construction on or after 19 April 1990, and before 1 July 2018; and
- that carry a Certificate of Fitness for the carriage of cargoes listed in Appendix 1 of IMO Resolution [A.673\(16\)](#).

Many products previously assigned a pollution hazard (P) were reassigned to safety hazard (S) and, in some cases, they were categorized as toxic products. Some product names also changed.

To allow for full compliance with the new requirements, the Administrator provided for a transition period in accordance with MARPOL Annex II/ 4.4.1. This transition period expired 31 December 2021.

As a result, OSVs certified in accordance with IMO Resolution A.673(16) are no longer permitted to carry many of the products listed in Appendix 1 of that resolution. They are permitted to carry only:

- products which for safety reasons may be assigned for carriage on a type 3 ship, as defined in the IBC Code, and which are not required to meet the requirements for toxic products in section 15.12 of that Code;
- noxious liquid substances which would be permitted for carriage on a type 3 ship; and
- flammable liquids.

To carry a broader range of the products in IBC Chapter 17 and MEPC.2/Circ.28, an OSV must now comply fully with either the IBC Code or the OSV [Chemical Code](#).

OSV Chemical Code

The OSV Chemical Code, which superseded IMO Resolution A.673(16), is applicable to OSVs with keels laid on or after 1 July 2018, or were at a similar stage of construction. Section 1.1.9 permits the carriage of the following products:

- those listed in chapters 17 or 18 of the IBC Code and the latest edition of the MEPC.2/Circ.28 and their related references to chapters 15 and 19; or
- oil or water-based mud containing mixtures of products listed in chapters 17 and 18 of the IBC Code and the MEPC.2/Circ.28; or

1. *2019 Amendments to the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk.*

- liquid carbon dioxide (high purity and reclaimed quality) and liquid nitrogen; or
- contaminated backloads.

GUIDANCE

- 1.0 OSVs with keels laid before 1 July 2018 can choose to:
 - 1.1 comply fully with the [OSV Chemical Code](#); or
 - 1.2 be restricted to carrying a revised products list under IMO Resolution [A.673\(16\)](#) as indicated in a newly issued Certificate of Fitness.
- 2.0 Shipowners and operators of A.673(16) compliant OSVs are advised to:
 - 2.1 contact the relevant coastal State authority to discuss the requirements for operating in its jurisdiction;
 - 2.2 consult their Class Society for vessel-specific requirements; and
 - 2.3 immediately implement the training in IMO Resolution [A.1122\(30\)](#).